

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**Comcast of Massachusetts I, Inc.**

Plaintiff,

vs.

**Bill Grammer**

Defendant

) Case No.: **1:04-cv-10867 PBS**

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**PLAINTIFF'S SECOND MOTION TO  
EXTEND TIME TO MOVE FOR  
DEFAULT JUDGMENT OR TO ASSENT  
TO OPENING OF DEFAULT**

**NOW COMES** Plaintiff, Comcast of Massachusetts I, Inc., to the above-captioned case respectfully requests that this Court extend the deadlines for the Plaintiff to move for Default Judgment to August 31, 2005.

As grounds, the Plaintiff states:

1. Plaintiff's Counsel has been contacted by Counsel for the Defendant, Attorney Stanley P. Roketenetz, Jr. of Woburn, MA.
2. Plaintiff's Counsel has submitted written settlement documentation to Defendant's but Defendant has been out of town on business and has not been able to respond to the settlement proposal as of this date.
3. Additionally, Attorney Roketenetz is in the process of applying to allow for electronic filings with this court.
4. Finally the Defendant assents to this motion.

In further support of this motion, see affidavit of John M. McLaughlin

**Certification pursuant to LR D. Mass 7.1 (A) (2)**

Plaintiff's Counsel certifies that he has conferred with Defendant's Counsel, who assents to this motion.

Respectfully Submitted for the Plaintiff,  
Comcast of Massachusetts I, Inc.  
By Its Attorney

8/5/05/  
Date

/s/ John M. McLaughlin  
John M. McLaughlin (BBO: 556328)  
**Green, Miles, Lipton & Fitz-Gibbon LLP**  
77 Pleasant Street  
P.O. Box 210  
Northampton, MA 01061-0210  
(413) 586-0865

**CERTIFICATE OF SERVICE**

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 5th day of August 2005, a copy of the foregoing motion and affidavit were sent via electronic mail to

Attorney Stanley P. Roketenetz, Jr.  
sroketenetz@yahoo.com

/s/ John M. McLaughlin  
John M. McLaughlin